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and Proposed Attorneys for Liddle & Robinson, L.L.P.,
each a Debtor and Debtor in Possession*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11
: Case No. 19-10747 (SHL)
: Debtor :
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In re : Chapter 11
: Case No. 19-12346 (SHL)
LIDDLE & ROBINSON, L.L.P.,¹ : (Joint Administration Requested)
: Debtor :
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**NOTICE OF AGENDA FOR MATTERS SCHEDULED FOR
THE HEARING ON AUGUST 8, 2019 AT 11:00 A.M.**

Time and Date of Hearing: August 8, 2019 at 11:00 a.m. (EDT)

Location of Hearing: United States Bankruptcy Court for the Southern District of New York, before the Honorable Sean H. Lane, United States Bankruptcy Judge, **Room 701**, One Bowling Green, New York, NY 10004-1408

PLEASE TAKE NOTICE that an agenda with respect to all matters set for hearing on **August 8, 2019 at 11:00 a.m. (EDT)** is set forth below. Copies of each pleading identified below can be viewed and/or obtained by: (i) accessing the Court's website at www.nysb.uscourts.gov, or

¹ The last four digits of Liddle & Robinson, L.L.P.'s taxpayer identification number are 6440.

(ii) contacting the Office of the Clerk of Court at One Bowling Green, New York, New York 10004. Note that a PACER password is required to access documents on the Court's website.

AGENDA

I. CASE CONFERENCE

- A. Case Status Update
- B. Update on Tara Liddle Adversary Proceeding No. 19-01147
 - 1. Motion for Temporary Restraining Order **[19-01147 ECF No. 2]**
- C. Request for Omnibus Hearing Dates for October 2019

II. ADJOURNED ITEMS

- A. Notice of Hearing on Motion of Debtor for an Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals **[19-10747 ECF No. 126]**
 - 1. Status: Motion has been adjourned to August 19, 2019.
- B. Notice of Presentment of Debtor for an Order under 11 U.S.C. § 105 and 2002(M), 9007 and 9014 of the Federal Rules of Bankruptcy Procedure Establishing Certain Notice, Case Management and Administrative Procedures and Opportunity for a Hearing **[ECF No. 109]**
 - 1. Related Documents:
 - (i) Motion to Authorize Presentment with 14 Days' Notice for an Order under 11 U.S.C. § 105 and 2002(M), 9007 and 9014 of the Federal Rules of Bankruptcy Procedure Establishing Certain Notice, Case Management and Administrative Procedures **[19-10747 ECF No. 110]**
 - (ii) Limited Objection by Counsel Financial II LLC, LIG Capital LLC and Counsel Financial Holdings LLC to Debtor's Motion and Proposed Order Establishing Certain Notice, Case Management and Administrative Procedures **[19-10747 ECF No. 120]**
 - (iii) Revised Proposed Order Establishing Certain Notice, Case Management and Administrative Procedures **[19-10747 ECF No. 122-1]**
 - (iv) Notice of Hearing on Amended Joint Motion for an Order under 11 U.S.C. § 105 and 2002(M), 9007 and 9014 of the Federal Rules of Bankruptcy Procedure Establishing Certain Notice, Case Management and Administrative Procedures **[19-10747 ECF 143 and 19-12346 ECF No. 24]**

2. Status: Motion has been adjourned to August 19, 2019.
- C. VW Credit, Inc's Motion for Relief from Automatic Stay Pursuant to 11 U.S.C. Section 362(d)(1) & (2) **[19-10747 ECF No. 77]**
 1. Status: Motion has been adjourned by consent of all parties until September 2019.
- D. Motion by M&T Bank for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 **[19-10747 ECF No. 107]**
 1. Related Documents:
 - (i) Memorandum of Law in Support of Motion for Relief from Stay re: 560 Main Street, Southampton Town, NY 11978 **[19-10747 ECF No. 108]**
 2. Status: Motion has been adjourned by consent of all parties until September 2019.
- E. Objection to Homestead Exception **[19-10747 ECF No. 118]**
 1. Related Documents:
 - (i) Notice of Hearing to Consider Objection to Debtor's Claim of Exempt Property **[19-10747 ECF No. 119]**
 2. Status: Motion has been adjourned by consent of all parties until September 2019.
- F. Cash Collateral Motion Conference
 1. Related Documents:
 - (i) Debtors' Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Use Cash Collateral, (II) Scheduling A Final Hearing And (III) Granting Related Relief **[19-10747 ECF No. 37]**
 - (ii) Debtor's Ex-Parte Motion for an Order Shortening Notice Period for Hearing on Debtor's Motion Under 11 U.S.C. §§ 105, 542 and 543 Directing Escrow Agent or Custodian to Turnover Property **[19-10747 ECF No. 13]**
 - (iii) Motion Under 11 U.S.C. §§ 105, 542 and 543 for Turnover of Property by Escrow Agent or Custodian **[19-10747 ECF No. 14]**

- (iv) Order Granting Debtor's Ex-Parte Motion for an Order Shortening Notice Period for Hearing on Debtor's Motion Under 11 U.S.C. § 543 Directing Escrow Agent or Custodian to Turnover Property ("Turnover Motion") **[19-10747 ECF No. 16]**
- (v) White & Wolnerman Statement in Support of Turnover Motion **[19-10747 ECF Nos. 18 & 19]**
- (vi) Response by Counsel Financial II LLC to Debtor's Motion (i) Under 11 U.S.C. §§ 105, 542 and 543 for Turnover of Property by Escrow Agent or Custodian; and (ii) Under 11 U.S.C. § 363 for Use of Cash Collateral **[19-10747 ECF Nos. 23 & 24]**
- (vii) Order Signed On 4/1/2019, Granting Debtor's Motion For An Order Directing Custodian To Turnover Property And For An Interim Order Authorizing The Debtor To Pay Rent Expenses And Granting Related Relief **[19-10747 ECF No. 27]**
- (viii) Letter Motion to Allow Payment of Employee Wages filed by William F. Gray on behalf of Jeffrey Lew Liddle **[19-10747 ECF No. 28]**
- (ix) Order Signed On 4/2/2019, Granting Motion To Allow Payment Of Employee Wages **[19-10747 ECF No. 29]**
- (x) Debtor's Ex-Parte Motion For An Order Shortening Notice Period For Hearing On Debtor's Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Use Cash Collateral, (II) Scheduling A Final Hearing And (III) Granting Related Relief **[19-10747 ECF No. 38]**
- (xi) Letter to Hon. Sean Lane dated 4/9/19 from David H. Wander on behalf of Counsel Financial II, LLC **[19-10747 ECF No. 40]**
- (xii) Order Granting Debtor's Ex-Parte Motion For An Order Shortening Notice Period For Hearing On Debtor's Motion Debtors' Motion For Entry Of Interim And Final Orders (I) Authorizing The Debtors To Use Cash Collateral, (II) Scheduling A Final Hearing And (III) Granting Related Relief **[19-10747 ECF No. 42]**
- (xiii) Objection by Counsel Financial II LLC to Debtor's Second Cash Collateral Motion **[19-10747 ECF No. 47]**
- (xiv) Interim Order Pursuant to 11 U.S.C. §§ 105, 361, 362 and 363 (I) Authorizing the Debtors to Use Cash Collateral, (II) Granting Adequate Protection to the Secured Parties, (III) Scheduling a Final Hearing and (IV) Granting Related Relief **[19-10747 ECF No. 52]**

- (xv) Memorandum of Law by Counsel Financial II LLC in Support of its Perfected Security Interest in and Lien on Cash Collateral [ECF No. 74]
- (xvi) Debtor's Response and Memorandum of Law in Opposition to Counsel Financial II LLC's Claim of a Perfected Security Interest in and Lien on Certain Cash Collateral [19-10747 ECF No. 84]
- (xvii) Letter regarding June 24, 2019 Hearing on Debtor's Cash Collateral Motion [19-10747 ECF No. 104]
- (xviii) Letter dated July 1, 2019 [19-10747 ECF No. 114]
- (xix) Letter dated July 2, 2019 [19-10747 ECF No. 115]
- (xx) Proposed Order Denying Counsel Financial II LLC's Claim of a Perfected Security Interested In and Lien on Certain Cash Collateral and Granting Related Relief sent to Judge's Chambers and counsel on July 2, 2019.

2. Status: Motion has been adjourned by consent of all parties until September 2019.

Dated: August 1, 2019
New York, New York

Respectfully submitted,

/s/ Alison D. Bauer
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